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August 20, 1999

US Department of Transportation Dockets
Docket No. FAA-1999-5925
400 Seventh Street SW., Room Plaza 401
Washington, DC 20590

RE: Docket No. FAA 1999-5925: Reduced Vertical Separation Minimum (RVSM)

The National Business Aircraft Association (NBAA) represents the interests of over **5,900** Member companies that own or operate over 8,000 aircraft as an aid to the conduct of their business, or are involved with business aviation. NBAA's Members operate all make and manner of aircraft from single- and twin-engine, piston-powered aircraft to large, complex turbo-jet aircraft.

NBAA members make up a significant minority of traffic in both the North Atlantic (NAT) and Pacific routes. (Note: At or above FL 390, NBAA members make up approximately 30% of the traffic). As such, our members have a significant stake in the implementation of RVSM. We continue to support RVSM operations in the NAT and will closely monitor its implementation in the Pacific and other regions.

NBAA would urge consistency in implementation of RVSM as it moves out of the NAT to other regions. Currently, RVSM is only in effect for FLs 310 - 390, inclusive in the NAT (and Canadian CRVSM). We strongly urge that Pacific implementation be consistent with those altitudes for the sake of safety and training for crews that operate in the worldwide environment.

In addition, as noted above NBAA members fly a very wide spectrum of aircraft capable of flying in the oceanic airspace. Unfortunately, not all of the manufacturers of these aircraft will have been able to complete their respective RVSM Service Bulletins (SB's) by the February 24, 2000 implementation date. There must be some consideration given to those aircraft that have not been able to get the SB's and they should be handled on a case by case basis for a designated reasonable period of time to allow manufacturers enough time to publish SB's. While there are approximately 1,000 business type aircraft that fall into this dilemma, the numbers of these aircraft would not be large at any one time and this is a similar exception as was allowed when the NAT RVSM program first went into affect.

Thank you for your consideration of our comments.

Sincerely,

Robert P. Blouin
Senior Vice President, Operations